

EXHIBIT 3

From: Tanck, Paul
Sent: Thursday, June 14, 2012 11:57 AM
To: Arnie Weintraub
Cc: Schapira, Lisa; Balber, Scott; Tanck, Paul
Subject: RE: Secure Crossings Infringement contentions

Arnie,

I did respond to your inquiry and explained that we need Secure Crossing's discovery regarding the Zenwall products. I note, again, that the documents we have received so far from Secure Crossing to date are a meager 600 pages, most of which are the reexamination materials. Please provide a date certain by which you will be producing the remaining documents requested as well as Secure Crossing's interrogatory responses. The reason why we are asking for the discovery is so that Rockwell can properly update its contentions, if necessary.

In any event, it is my understanding based on Mr. Reeves's deposition testimony that the overall functionality of the Zenwall 5 and 10 products was the same and that any differences of the other Zenwall products regarded number of ports, mounting capabilities and the ability to be immersed in water. In other words, Mr. Reeves did not state that the various Zenwall products had different functionalities that would affect any claims of infringement in this case. Thus, based on Mr. Reeve's testimony, Secure Crossing has taken the position that the overall functionality of the Zenwall products is the same. If Secure Crossing has a different position, please let us know so we can further evaluate.

I further note that Secure Crossing's responses to Rockwell's first set of interrogatories was due on May 28, which Secure Crossing has waived all objections to. Interrogatory No. 6 stated that if Secure Crossing contends that any of the Zenwall products does not infringe the claims, that they state in detail each and every basis for that contention. Thus if Secure Crossing believes that there are distinguishing features that cause certain versions of the Zenwall product to not infringe as opposed to other versions of the product, that information needs to be provided as part of that response. Secure Crossing's delinquency in providing this information further inhibits Rockwell's ability to update the infringement contentions.

We look forward to your prompt response as to the date certain by which Rockwell will receive Secure Crossings' documents and interrogatory responses. If you are unwilling to give a date, please let me know a time today you are available so that we can meet and confer on the issue before we bring our motion to compel discovery.

Finally, if you could please use the "reply to all" function when responding to emails, this will enable the other cc'd recipients to receive the communications that we have back in forth in this case. Thank you in advance for your cooperation.

Best.

Paul

Paul J. Tanck
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-1116 | **fax** 212-541-5369
ptanck@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/ptanck.vcf>

Please consider the environment before printing this email.

From: Arnie Weintraub [<mailto:aweintraub@weintraubgroup.com>]

Sent: Thursday, June 14, 2012 11:29 AM

To: Tanck, Paul

Subject: RE: Secure Crossings Infringement contentions

Paul: First, you did not respond to my inquiry. Second, one of your secretaries has the June 1 documents. As to the outstanding discovery, the requisite docs are being retrieved to the extent they exist. However, please address my email, otherwise I can only assume that you are refusing to re-state your infringement contentions.

Arnie

From: Tanck, Paul [<mailto:PTanck@chadbourne.com>]

Sent: Thursday, June 14, 2012 10:53 AM

To: Arnie Weintraub

Cc: Balber, Scott; Schapira, Lisa; Tanck, Paul

Subject: RE: Secure Crossings Infringement contentions

Hi Arnie,

Have you produced all of Secure Crossings documents regarding the various Zenwall products? So far we have received a handful of documents, that total 600 pages, the majority of which are reexamination materials which are unrelated to the operation of the Zenwall products.

As you know we requested the Zenwall documents as part of Rockwell's first set of document requests, which Secure Crossings has waived all objections to. These documents were due to be produced to Rockwell on May 28th. In addition there is a Court Order for Secure Crossing to produce the technical documents regarding the Zenwall products by June 1st.

Please confirm that Secure Crossing has produced all of its documents pursuant to Rockwell's First Set of Document Requests and pursuant to the Court's order. Once we have the requested documents we will evaluate the infringement contentions as you requested.

Best regards,

Paul

Paul J. Tanck

Chadbourne & Parke LLP

30 Rockefeller Plaza, New York, NY 10112

tel 212-408-1116 | fax 212-541-5369

ptanck@chadbourne.com | <http://www.chadbourne.com>

vCard: <http://www.chadbourne.com/vcard/ptanck.vcf>

Please consider the environment before printing this email.

From: Arnie Weintraub [<mailto:aweintraub@weintraubgroup.com>]

Sent: Thursday, June 14, 2012 10:15 AM

To: Tanck, Paul

Subject: Secure Crossings Infringement contentions

Paul: in reviewing your infringement contentions you took the liberty of grouping the Zenwall products together as one. The models are different, as you know. Therefore, I am requesting that you revise your contentions and apply the claims as you deem fit to the individual models, i.e. identify which claims you believe the Zenwall -5 infringes, etc. Otherwise, I will be compelled to file a motion to seeking a more definite statement.

Arnie Weintraub

This e-mail, and any attachments thereto, is intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you have received this e-mail in error, please notify me by replying to this message and permanently delete the original and any copy of this e-mail and any printout thereof.

For additional information about Chadbourne & Parke LLP and Chadbourne & Parke, a multinational partnership, including a list of attorneys, please see our website at <http://www.chadbourne.com>